

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

DOUGLAS F. CARLSON
MOTION TO REQUIRE UNITED STATES POSTAL SERVICE
TO MAKE AVAILABLE A WITNESS FOR ORAL CROSS-EXAMINATION
CONCERNING STATUS REPORT ON IMPLEMENTATION
OF PROPOSED NEW POST-OFFICE-BOX FEE SCHEDULE

October 29, 1996

On October 23, 1996, the Postal Service filed Status Report of United States Postal Service on Implementation of Special Services Reform Proposals. This status report reveals some of the Postal Service's implementation plans for the proposed new post-office-box fees. In filing the status report, the Postal Service indicated that it is willing to make a witness available to answer questions about the status report.

The implementation plans raise several new questions since they alter the substance of some of the proposals. I believe that I can most effectively obtain answers to these questions by way of oral cross-examination, rather than written interrogatories, because I experienced some difficulty in obtaining responsive answers to several previous written interrogatories concerning post-office-box fees.¹ In addition, given the late date in the procedural

¹See, e.g., responses to the following interrogatories: DFC/USPS-T3-1(c) and DFC/USPS-T7-5 (where witness Needham's reason for being unable

calendar at which the Postal Service has produced details concerning implementation, the potential need for follow-up interrogatories--and eventual oral cross-examination--could cause discovery on the Postal Service's case-in-chief to continue into December.

Therefore, I request that the Commission schedule a hearing for oral cross-examination on the implementation plans. The Commission should direct that the Postal Service witness be prepared to answer questions pertaining to the interaction of the implementation plans with the testimony of earlier witnesses, not just specific questions about the technical details of the implementation plans.

In addition, given the personal financial and logistical constraints that I described in my Motion to Be Excused From Oral Cross-Examination on My Direct Testimony, which I served on October 25, 1996, I further request that the hearing be scheduled on Monday, November 25, 1996, and that the Commission announce a hearing date as soon as possible so that participants can make travel plans.

Respectfully submitted,

Dated: October 29, 1996



DOUGLAS F. CARLSON

to answer the question relies on facts that are irrelevant to the question). See also Response to DFC/USPS-T7-7, where the response merely begs the follow-up questions--namely, "Why did neither \$1 or \$2 seem sufficient?", and "Why is \$3 a reasonable fee?"

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the Rules of Practice.



DOUGLAS F. CARLSON

October 29, 1996
Emeryville, California